

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

JOHN P. PIERONI, ESQ.
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Number: 005591978
Attorney for Debtor, Madison Podesta

In Re:

Madison Podesta, Debtor

Case No.: 17-28734-RG

Chapter: 13

Judge: Hon. R. Gambardella

Hearing Date: Jan. 16, 2019

CERTIFICATION IN RESPONSE TO MOTION

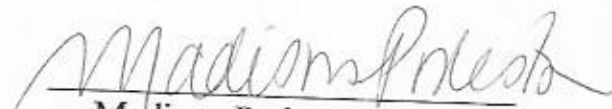
I, Madison Podesta, being of full age, hereby certify:

1. I am the Debtor in the captioned Chapter 13 Voluntary Bankruptcy case.
2. I am fully familiar with the facts and proceedings in this matter.
3. I submit this my Certification in response to the Motion filed on behalf of the Creditor, VW Credit Leasing, Ltd., seeking Relief from Stay in order to prosecute a repossession action with regard to a 2015 Audi Q3 2.0T PRM-PA. Vehicle Identification Number: WA1EFCFS9FR008417. The Motion was filed by KML Law Group, P.C., the Attorneys for the Creditor, VW Credit Leasing, Ltd., and has been made returnable on Wednesday, January 16, 2019, at 9:30 a.m. before the Honorable Rosemary Gambardella, Presiding Judge, United State Bankruptcy Court, Newark, New Jersey.
4. Attached to and made a part of the Certification of in support of the Motion for Relief from Stay is what appears to be a true copy of the "Lease - Motor Vehicle - Closed End" dated March 31, 2015, that I entered into with VW Credit Leasing, Ltd., at the time I leased the subject 2015 Audi Q3 automobile from the dealership, Town Audi of

Englewood. As indicated, the "Lease - Motor Vehicle - Closed End" was for a period of thirty-nine (39) months, beginning on March 31, 2015, and ending on June 31, 2018.

5. On or about June 14, 2018, I personally returned to Town Audi of Englewood, located at 4000 South Dean Street, Englewood, New Jersey 07631, the subject 2015 Audi Q3 automobile.
6. Contrary to the Certification in support of the Motion for Relief from Stay, the subject Lease matured on June 30, 2018, not September 30, 2018. Accordingly, instead of my allegedly owing \$888.00 post-petition on the subject March 31, 2015, Lease, I actually have a credit of \$107.00 on the subject March 31, 2015, Lease.
7. Based on the above, the Motion for Relief from Stay is without merit in that the Creditor, VW Credit Leasing, Ltd., has had possession of the subject 2015 Audi Q3 automobile, since the middle of June of 2018, when the subject Lease ended.
8. I hereby certify that the foregoing statements are true and accurate to the best of my knowledge, information, and belief. I understand that if I have made any willful misrepresentations, I am subject to punishment.
- 9.

Date: January 9, 2019


Madison Podesta, Debtor